

ISSUES ON APPEAL

These orders give rise to the following issues:

- I. Did the Court have jurisdictional, legal, factual, or evidentiary grounds to enter the Order Granting NBK's Emergency (Renewed Motion to Enforce Sale Order and Requiring Jetall Companies, Inc. to Vacate Property (Dkt. No. 871)?

- II. Did the Court have jurisdictional, legal, factual, or evidentiary grounds to enter the Order Releasing Deed of Trust Instrument No. RP-2021-258619 (Dkt. No. 872)?

- III. Did the Court have jurisdictional, legal, factual, or evidentiary grounds to enter the injunction contained within the Order Releasing Deed of Trust Instrument No. RP-2021-258619, which prohibits "2425 WL and any affiliated party, including without limitation Jetall Companies, Inc., Jetall Capital, LLC, Galleria 2425 JV, LLC, Galleria West Loop Investments II, LLC, Naissance Galleria, LLC, Naissance Capital Real Estate, LLC, and Mr. Ali Choudhri or other person or entity affiliated with any of the foregoing" from "bringing any action in any court challenging title to the Property?"

DESIGNATION OF ITEMS TO BE INCLUDED IN THE RECORD ON APPEAL

The following items from the bankruptcy case and adversary proceeding are to be included in the record on appeal. Each designated item shall also include any and all exhibits and documents annexed to and referenced within such items.

Dkt. No.	DESCRIPTION
	Docket Report
1	Chapter 11 Voluntary Petition Non-Individual Fee Amount \$1738 Filed by Galleria 2425 Owner, LLC. Chapter 11 Plan (Small Business) (dated 12/05/2023)
816	NBK's Emergency Motion to Enforce Sale Order (filed 11/18/2024)
817	Notice of Response Deadline and Hearing on NBK's Emergency Motion to Enforce Sale Order (entered 11/18/2024)

823	Witness and Exhibit List filed by National Bank of Kuwait, S.A.K.P., New York Branch (filed 11/20/2024)
825	Response to NBK's Emergency Motion to Enforce Sale Order filed by Jetall Companies, Inc. (filed 11/20/2024)
826	Witness List filed by Jetall Companies, Inc. (filed 11/20/2024)
829	Order Mooting Motion (entered 11/21/2024)
838	NBK's (Renewed) Emergency Motion to Enforce Sale Order (filed 12/02/2024)
839	NBK's Second Emergency Motion to Enforce Sale Order (2425 WL, LLC) (filed 12/02/2024)
843	Order Setting Hearing (entered 12/03/2024)
846	Witness and Exhibit List filed by National Bank of Kuwait, S.A.K.P., New York Branch (filed 12/04/2024)
847	Witness and Exhibit List filed by Jetall Companies, Inc. and 2425 WL, LLC (filed 12/04/2024)
848	Response to Emergency Motions filed by 2425 WL, LLC and Jetall Companies, Inc. (filed 12/04/2024)
849	Response filed by National Bank of Kuwait, S.A.K.P., New York Branch (filed 12/04/2024)
850	Exhibit List filed by National Bank of Kuwait, S.A.K.P., New York Branch (filed 12/04/2024)
851	Witness List filed by Jetall Companies, Inc. and 2425 WL, LLC (filed 12/04/2024)
852	Notice of Suggestion of Bankruptcy (filed 12/05/2024)
861	NBK's Supplement to Emergency Motions to Enforce Sale Orders (filed 12/06/2024)
863	Order Vacating Abatement (entered 12/06/2024)
870	Memorandum Opinion (entered 12/06/2024)
871	Order Granting Emergency Motion to Enforce Sale Order and Requiring Jetall Companies, Inc. to Vacate Property (entered 12/06/2024)

872	Order Releasing Deed of Trust Instrument No. RP 2021-358619 (entered 12/06/2024)
873	Transcript of Hearing on Emergency Motions held on 12/05/2024 (prepared 12/07/2024)
875	Notice of Appeal (filed 12/08/2024)

Appellants reserve the right to amend, modify, and/or supplement the foregoing statement of issues and designations and/or object, or otherwise supplement or move to strike or modify, some or all of the appellees' counter-designation of additional items to be included in the record on appeal and/or cross-statement of issues on appeal. This filing is made expressly subject to, and without waiver of any and all rights, remedies, challenges, and objections.

Respectfully submitted,

/s/ J. Carl Cecere

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CERTIFICATE OF SERVICE

The undersigned certifies that on this 23rd day of December, 2024, a true and correct copy of the foregoing was served on the following in accordance with the CM/ECF e-filing system, and upon all others who have consented to service in this case by registering to receive notices in this case through the CM/ECF e-filing system.

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/s/ J. Carl Cecere

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